✓ Environmental Restoration Meeting Minutes 0041839 Job No. 22192 CCN: NA TSD: NA t Code: 4170: 4170

019234

SUBJECT 200-ZP-2 Operable Unit Mananger's Meeting

TO

Distribution

FROM

Sean A. Driggers

DATE

July 10, 1995

## **ATTENDEES**

S. A. Driggers

D. A. Faulk

B. L. Foley

G. C. Henckel

S. Leja

K. R. Porter

V. J. Rohav

R. S. Weeks

T. A. Wooley

## DISTRIBUTION

Attendees

200-ZP-2 Project File

**BHI Document Control H4-79** 



A meeting on the above subject was held on June 20, 1995, at 2440 Stevens Center, CR 1600.

A Unit Manager's Meeting was held between representatives of the ERC, DOE, EPA, and Ecology to status the 200-ZP-2 Operable Unit Carbon Tetrachloride Expedited Response Action (ERA). The attached handout was provided to attendees as a summary of points for discussion.

Sean Driggers provided a status of ERA activities completed to date. The status of the cleanup milestone development for the ERA was the primary issue of discussion. Sean Driggers explained that establishing an interim cleanup level for the ERA was a difficult task that required technical evaluation of vapor extraction progress to date and carbon tetrachloride phase partitioning coefficients. In addition, Sean pointed out that setting a milestone based on meeting a specific cleanup level was not practical within the framework of the Tri-Party Agreement since a target date for milestone achievement could not be established. Sean proposed that an interim progress report for the ERA be prepared that would summarize information needed to support a technically defensible cleanup level for the ERA and that agreement to complete the documentation be established with a National Priorities List Agreement, signed by the Unit Managers. Dennis Faulk stated that this approach was not acceptable to the EPA.

Dennis informed attendees that the ERA is expected to continue to operate until final cleanup of carbon tetrachloride is achieved. Dennis stated that establishment of a Tri-Party Agreement (TPA) Milestone or the preparation of a Proposed Plan for an interim action was required to provide EPA with enforceability over the ERA and a basis for continued ERA funding under current and projected DOE budget restrictions. Dennis stated that either approach would be acceptable to EPA. Bryan Foley, representing DOE/RL, agreed that the preferable path would be the development of a TPA milestone.

The discussion continued focusing on the approach for establishing the TPA milestone. Dennis said that he envisioned the milestone would set a cleanup goal which the vapor extraction system would attempt to meet. He added that interim milestones would be established to provide a periodic evaluation of the vapor extraction operations against the cleanup goal. George Henckel asked Dennis what cleanup standards would apply to the ERA that could be used as a basis for the cleanup goal. Dennis stated that the Model Toxics Control Act (MTCA) Method C formula values for carbon tetrachloride in soil would likely be the final cleanup standards for the ERA, and that these values could be used to set a goal for the milestone. George stated that he wanted to be sure that Ecology agreed with this position. George suggested that agreement to use MTCA Method C criteria should be documented with an NPL Agreement that would ensure Ecology's concurrence. Attendees agreed with this suggestion.

The following approach was agreed upon for developing the cleanup goal: 1) continue the partitioning coefficient determination for carbon tetrachloride and soil vapor extraction tests currently underway at Washington State University, 2) use the MTCA Method C criteria to establish a soil cleanup goal for the ERA, and 3) use a milestone to set a cleanup goal against which to compare the on-going removal efficiency of vapor extraction. It was agreed that language should be included in the milestone that would require it to be evaluated annually and if necessary, interim milestones would be established to periodically evaluate progress of the ERA towards achievement of the cleanup goal.

## Action Items:

- 1) Reconvene a meeting after the fourth of July vacations to ensure that the milestone approach is the route that DOE/RL wants to pursue. Actionee: Bryan Foley
- Prepare meeting minutes and accompanying NPL Agreement to document agreement of the approach for establishing a TPA milestone for the ERA and use of MTCA Method C cleanup standards for setting a cleanup goal for the ERA. Actionee: Sean Driggers

Control Number:	200 NPL Agreement/Change Control Form		Date Submitted:
			July 10, 1995
BHJ - 00429 _ Change _X Agreement _		nformation	Date Approved:
	Operable Unit(s): 200-ZP-2	,	
Document Number/Title: N/A		Date Document Last Issued: N/A	
Originator: S. A. Driggers		Phone: 372-9298	
Summary Discussion:			
A Unit Manager's meeting was held June 20, 1995 between representatives of the ERC. DOE. EPA, and Ecology to status the 200-ZP-2 Operable Unit Expedited Response Action (ERA). Discussions during the meeting focused on the status of progress towards development of a Tri-Party Agreement (TPA) milestone for the ERA. The purpose of this NPL Agreement is to document the Unit Managers' agreement on the general approach for establishing the TPA milestone and their agreement to use the Model Toxics Control Act Method C criteria as a basis for establishing a cleanup goal for the ERA. The meeting minutes attached to this agreement are provided for reference.			
Justification and Impact of Change:			
Development of a Tri-Party Agreement milestone for the ERA is requested by the EPA unit manager as an alternative to preparing an Interim Remedial Measures Proposed Plan and issuing an Interim Action Record of Decision.			
G. C. Henckel 200 Areas Project Manager		7/20/25-	
B. L. Foley  DOE Project Manager		Date 1/20/95	
		Date N/A	
D. A. Faulk /tu Env. Protection /	Agency Unit Manager Fault [	Date 7	120195
Per Action Plan for Implementation of the Hanford Consent Order and Compliance Agreement Section 9.3.			